

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)

KML Law Group, P.C.
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Attorneys for Movant: BANK OF AMERICA, N.A.

In Re:

Bryan J. Sachs
Debtor

Case No.: 22-11662 MBK

Chapter: 13

Judge: Michael B. Kaplan

**CERTIFICATION IN SUPPORT OF
MOTION FOR RELIEF FROM AUTOMATIC STAY**

I, Arlene Skelly, declare under penalty of perjury as follows:

1. I am a/an Assistant Vice President of Bank of America, N.A (“BANA”) and am authorized to sign this certification on behalf of BANA, (“Movant”), with respect to a certain loan (the “Loan”) provided to Debtor(s), which Loan is evidenced by the Note (defined below) and secured by the Mortgage (defined below). This certification is provided in support of Movant’s Motion for Relief from Stay (the “Motion”).

2. As part of my job responsibilities for BANA, I have personal knowledge of and am familiar with the types of records maintained by BANA in connection with the Loan and the procedures for creating those types of records. I have access to the books, records and files of

BANA that pertain to the Loan and extensions of credit given to Debtor(s) concerning the Property (defined below).

3. The information in this certification is taken from BANA's business records regarding the Loan. I have personal knowledge of BANA's procedures for creating these types of records. The records are: (a) made at or near the time of the occurrence of the matters recorded by persons with personal knowledge of the information in the business record, or from information transmitted by persons with personal knowledge; (b) kept in the course of BANA's regularly conducted business activities; and (c) it is the regular practice of BANA to make such records.

4. The Debtor(s) has/have executed and delivered or is/are otherwise obligated with respect to that certain promissory note in the original principal amount of \$125,002.00 (the "Note"). A copy of the Note is attached hereto as Exhibit A.

5. Pursuant to that certain Mortgage (the "Mortgage"), all obligations (collectively, the "Obligations") of the Debtor(s) under and with respect to the Note and the Mortgage are secured by the Property (as defined in the Motion). A copy of the Mortgage is attached hereto as Exhibit B.

6. As of September 09, 2022, the outstanding amount of the Obligations less any partial payments or suspense balance is \$35,004.89.

7. As of September 09, 2022, the per diem interest is \$5.04.

8. In addition to the other amounts due to Movant reflected in this Motion, as of the date hereof, in connection with seeking the relief requested in this Motion, Movant has also incurred legal fees and legal costs. Movant reserves all rights to seek an award or allowance of such fees and expenses in accordance with applicable loan documents and related agreements,

the Bankruptcy Code and otherwise applicable law.

9. The following chart sets forth the number and amount of postpetition payments due pursuant to the terms of the Note that have been missed by the Debtor(s) as of September 09, 2022:

Number of Missed Payments	From	To	Monthly Payment Amount	Total Missed Payments
3	07/01/2022	09/01/2022	\$1,334.20	\$4,002.60
Less postpetition partial payments (suspense balance):				\$0.00
				Total: <u>\$4,002.60</u>

10. As of September 09, 2022, the date of the last payment received is 06/10/2022.

11. Attached hereto as Exhibit C, is the Certification Re Post-Petition Payment History on the Note and Mortgage.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 23 day of September, 2022.


Name: Arlene Skelly
Title: Assistant Vice President